

Comments to the Proposed Tongass Integrated 5-Year Vegetation Plan: 2010-2014

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Hello Mr. Cole:

Following are my comments to the Proposed Tongass National Forest Integrated 5-Year Vegetation Plan: 2010-2014.

1. The Proposed Plan Evolved From A Flawed Process.

The website introduction to the proposed plan claims that it “reflects feedback the Forest has received from many local and regional stakeholders over the past 4 years.” As you know the feedback upon which this plan was devised was not public but rather was derived from a tightly controlled group of handpicked so-called “stakeholders” a.k.a. the Tongass Futures Roundtable. TFR proceedings did not incorporate the NEPA or any other public process, nor did the TFR consider or incorporate the views of non-roundtable participants. Dissenting views of participants were strictly constrained to the point of being moot. The Roundtable never allowed its meetings to be recorded by the media. Federal, State and Municipal representatives attended meetings as stakeholders yet the public who fund their salaries were never allowed a transparent view of meeting proceedings. These same non-elected (for the most part) public officials never sought the perspective of those whom they represented nor did they ever provide regular reports to their publics regarding TFR proceedings. For the Forest Service to portray the proposed plan as being derived from an open and transparent process is disingenuous at best and at worst a violation of various State Open Meetings Act and Federal Advisory Committee Act regulations.

2. No Documentation Was Provided with the Schedule.

While the proposed plan provides a very difficult to decipher spreadsheet listing the forest projects for the next five years, there was no documentation regarding how the Forest Service intends to implement those projects or exactly what parameters constitute the various management categories.

For instance, given that the Tonka area on Mitkof Island has approximately 8 MMBF of timber remaining from previous NEPA cleared timber sale(s) for which no market apparently exists how can offerings of 120 MMBF on the Petersburg Ranger District alone be anything more than a pipe dream? Exactly what are the markets for this timber? Will these sales be intended strictly for the Alcan style export market? Are there any plans in the works to establish a new mill on the Tongass? If so, would such a facility be functional well within the five-year period? Since the Forest Service maintains the plan will translate to jobs please provide a discussion regarding the available markets to support those jobs, especially if this timber is intended for export. Please provide an analysis of the federal subsidies required to implement this five-year plan. With virtually no forest products processing infrastructure remaining on the forest your plan appears to have very little basis in reality. Answers to these basic questions are crucial to an understanding of how the agency intends to successfully implement the plan.

Additionally, please provide an explanation of the various management categories listed in your proposed plan, i.e., forest, wildlife, watershed and FM/WL management. How much old growth logging will be permitted in the “wildlife restoration” areas? Will logging be allowed in previously untouched stands of old growth as an incentive for “wildlife restoration” stewardship contracts? If so, please explain how unlogged old growth stands can be credibly “restored” for the benefit of wildlife. I note that although the parameters of wildlife restoration are not clearly described, the Kuiu Stewardship project lists clearcutting and integrated timber management as the silvicultural methods to be employed. It is well known that clearcutting is not a credible wildlife restoration method, so exactly what is the stewardship goal for the Kuiu project? Similarly, will fish habitat management allow for logging within anadromous corridors or other wildlife management allow for logging within the beach fringe? Will “conservation management” include clearcutting as a silvicultural method? Shouldn’t all the management

descriptions be subject to a truth-in-labeling clause?

3. The Proposed Plan Requires a Programmatic NEPA Triggered Environmental Impact Statement.

From all appearances the 5-year plan was derived from obligations of the break out TFR group “Tongass Conservation Collaborative” (TCC) restricted grant obligations to allow for “bridge timber” in the transition mix. Further, the plan was intended to circumvent NEPA's obligation for public process and escape the legal confines of accountability. It is quite apparent that the amount of bridge timber i.e. old growth that will be cut under this plan does not represent a transition but rather more of the same decades old failed timber policy...just with a different wrapping.

If my calculations are correct your agency intends to offer 529 MMBF and sanction the construction of 234 miles of road concentrated in central SE Alaska (Petersburg, Wrangell, POW and Ketchikan areas) in the next five years under this plan. Due to the cumulative impact that will result from logging and road construction under the 5-year plan, a programmatic EIS is required. In the absence of such a document the public will not be fully informed of the significant cumulative consequences of the proposed plan and will likely result in yet more litigation.

4. The Amount of Young Growth Vs. Old Growth Timber Available for Logging is Not Clearly Identified.

Obviously, the ability to transition to second growth timber is dependent on the availability of loggable second growth. Knowing how much second growth is currently or soon to be available is key to the successful implementation of this plan.

According to Regional Forester Beth Pendleton (KRBD10/5/10) the agency is in the process of inventorying its second growth stands on the Tongass. It is indeed odd that after 50 years of intensive forest management the agency failed to maintain an accurate forest inventory. At the very least, wasn't this inventory the basis for decades of agency claims regarding sustainability? Regardless, given that the Tongass has traditionally been managed on a 100-150 year rotation what is the basis for suddenly “adjusting” the rotation to 70-75 years as you were quoted in the same KRBD interview? Is this because the Forest Service now plans to “transition” the forest to a pellet farm or veneer mill supplier? If so, exactly what infrastructure will support the pellet farms or veneer plantations? And how much old growth will be included in the new adjusted rotation schedule? How will this fit into your sustainability model?

It appears that your agency is putting the cart before the horse with this proposed 5-year schedule. **Prior** to any plan of this significance your agency must have an accurate accounting of the amount of young growth available to industry at various time increments as well as the market for any new forest products industry. Please clearly disclose this as well as the subsidies and logistics to required for establishing entirely new industries like biofuel pellet plants and veneer mills on the Tongass. Also, please disclose how the cutting of young growth can be economic enough to pay for restoration and for an operator to make a profit for the so-called stewardship projects. Will old growth be included as an incentive? How much? Again answers to these questions are crucial in evaluating the viability of your proposed plan.

While I could comment further, much of what I would have to say would be premature based on the absence of the most basic information in your proposed plan.

I will say though that that the cutting down of our national forest and it's conversion to pellets for the purpose of producing biofuel pellets is no more green than the removal of mountain tops for the production of coal. If a credible carbon accounting was undertaken to determine the net amount of CO2 released in conversion of the forest to pellets compared to the amount sequestered if the trees were left standing I have no doubt the figure would be highly negative. So before your agency tries to spin biofuels as green, you should have some credible figures to back up that claim.

Thank you,

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